



**Michael J. Willemin**

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August 22, 2024

**VIA ECF**

The Honorable Lewis A. Kaplan  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Courtroom 21B  
New York, NY 10007-1312

Re: Parker v. Alexander, et al., Civil Case No. 24 Civ. 4813 (LAK)(OTW)

Dear Judge Kaplan:

We represent Plaintiff Angelica Parker in the above-referenced action and write jointly with Defendants in connection with the attached proposed scheduling order.

The parties understand that the Court's June 28, 2024 Order (Dkt. No. 12) suggests that an initial conference is not required to the extent that the parties are able to agree upon a schedule that calls for the filing of the pretrial order by December 28, 2024. The parties have agreed upon a schedule discovery schedule, reflected in the attached proposed scheduling order, but do not believe that discovery can be completed by December 28, 2024. The primary reason for this is that the parties' initial disclosures collectively identified approximately 50 potential third-party witnesses. While we do not expect that testimony will ultimately be taken from 50 witnesses, obtaining discovery from third party witnesses is often unpredictable. Subpoenas will be served, which will likely lead to involvement by third-party attorneys, meet and confers, potential motions to quash, etc. As such, while the parties will endeavor to complete discovery as expeditiously as possible, we respectfully request that the Court approve a February 28, 2025 deadline to complete discovery, and an April 18, 2025 deadline to submit a pretrial order.

To the extent that the Court believes that an initial conference is necessary to address these proposed deadlines or any other issues, we will of course be prepared to do so on September 4, 2024. We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. J. Willemin', is written over a horizontal line.

Michael J. Willemin

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Angelica Parker,

Plaintiff,

24-CV-4813 (LAK)

v.

Tal Alexander, et al.,

Defendant(s).

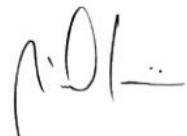
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Consent Scheduling Order

Upon consent of the parties, it is hereby  
ORDERED as follows:

1. No additional parties may be joined after September 18, 2024.
2. No amendments to the pleadings will be permitted after September 18, 2024.
3. The parties shall make required Rule 26(a)(2) disclosures with respect to:
  - (a) expert witnesses on or before December 13, 2024 ;
  - (b) rebuttal expert witnesses on or before January 17, 2025 .
4. All discovery, including any depositions of experts, shall be completed on or before February 28, 2025
5. A joint pretrial order in the form prescribed in Judge Kaplan's individual rules shall be filed on or before April 18, 2025 .
6. No motion for summary judgment shall be served after the deadline fixed for submission of the pretrial order. The filing of a motion for summary judgment does not relieve the parties of the obligation to file the pretrial order on time.
7. If any party claims a right to trial by jury, proposed voir dire questions and jury instructions shall be filed with the joint pretrial order.
8. Each party or group of parties aligned in interest shall submit not less than ten (10) days prior to trial (a) a trial brief setting forth a summary of its contentions and dealing with any legal and evidentiary problems anticipated at trial, and (b) any motions in limine.
9. This scheduling order may be altered or amended only on a showing of good cause not foreseeable at the date hereof. Counsel should not assume that extensions will be granted as a matter of routine.

Dated: August 22, 2024



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Lewis A. Kaplan  
United States District Judge

CONSENTED TO: [signatures of all counsel]



Counsel for Alon and Oren Alexander



Counsel for Tal Alexander